

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOHN STUART,

Defendant.

21-CR-07-LJV-JJM

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal Public
Defender

DATE, TIME & PLACE:

Before the Honorable Jeremiah J. McCarthy, United
States Magistrate Court Judge, Robert H. Jackson
United States Courthouse, 2 Niagara Square,
Buffalo, New York, **on the papers submitted.**

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender
Jeffrey T. Bagley, dated February 18, 2022.

RELIEF REQUESTED:

A one-week extension on the defense's reply to the
government's opposition currently due on February
22, 2022.

DATED:

Buffalo, New York, February 18, 2022.

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley
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Counsel for Defendant John Stuart

TO: Laura A. Higgins
Assistant United States Attorney

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AFFIRMATION

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and I represent the defendant, John Stuart, in the instant matter.
2. A reply to the government's opposition to Mr. Stuart's objection is currently due on February 22, 2022.
3. I request a one-week extension to work on that briefing.
4. Assistant United States Attorney Laura Higgins has no objections.
5. The parties have no objection to keeping in place the current oral argument date of March 11, 2022.

WHEREFORE, it is respectfully requested that the defense have a one-week extension to submit their reply to the government's opposition to Mr. Stuart's objections.

DATED: Buffalo, New York, February 18, 2022.

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley

Assistant Federal Public Defender

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Counsel for Defendant John Stuart

TO: Laura A. Higgins
Assistant United States Attorney